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J.H. BAXTER & CO., a California Limited Partnership

August 10, 2004

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Ms. Jan Palumbo
United States EPA, Region 10
Mail Stop WCM-126
1200 Sixth Avenue
Seattle, WA 98101

Re: Excavation of Ditch Material
J.H. Baxter & Co. Arlington, Washington facility
AOC Docket No. RCRA-10-2001-0086
EPA ID #: WAD 05382 3019

Dear Ms. Brown:

As we have previously discussed, J.H. Baxter & Co. (Baxter) plans to excavate material from two ditches at the Arlington Wood Treating Facility as part of the planned Stormwater Improvement Measures. This letter outlines our approach, based on discussions and correspondence with you.

Background

The purpose of this improvement measure is to remove material with low levels of site-related chemicals from Ditch 1 and Ditch 2. The activities associated with the ditch excavation will be conducted under the provisions of Paragraph 63 of the Administrative Order on Consent (AOC) regarding other work at the facility.

Material within Ditches 1 & 2 includes eroded soil and rock ditch base material and is collectively identified as ditch material. Current plans call for excavation of ditch material from Ditch 1 and Ditch 2 as shown on the attached Figure 1. Baxter has sampled the material in these ditches as part of the Site Investigation and the results are summarized on Figure 1. Sampling results indicate that pentachlorophenol (PCP) concentrations range from 1.9 mg/kg to 11 mg/kg, with the highest concentrations just slightly above the United States Environmental Protection Agency's (EPA) Region IX's Preliminary Remediation Goal (PRG) of 9 mg/kg for direct contact with soil.

Synthetic Leaching Precipitation Procedure (SPLP) testing was conducted on samples of the ditch material to evaluate the potential of PCP leaching. The results of the SPLP testing ranged from 0.820 µg/L to 4.0 µg/L, indicating the low potential for PCP to leach from the ditch material.

In addition, concentrations of diesel-range organics were detected in the soils. These concentrations ranged from 140 mg/kg to 2,100 mg/kg.

Excavation Approach

We anticipate conducting excavation activities during a period of dry weather. However, any remaining water in the ditches will be removed and treated using the pilot treatment system. Treated water will be discharged in accordance with the Ecology approved interim stormwater treatment protocols.

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The ditch material will be excavated from the entire lengths of Ditches 1 & 2. The material will be excavated using a backhoe or similar excavation equipment to approximately six inches below the geotextile base fabric that is present in the ditches. The backhoe will place the excavated material directly into a steel roll-off bin (or alternatively into a dump truck which will transfer the soil to a roll-off bin) for temporary storage. If necessary, inert dry material (i.e., dry clean soil, diatomaceous earth, or cement) will be added to the excavated material to absorb any free liquids. The roll-off bins will be temporarily covered with plastic.

Confirmation Sampling

Following excavation activities, two soil samples will be collected from Ditch 1, and two soil samples will be collected from Ditch 2. The soil samples will be analyzed for PCP by EPA Method 8151, polycyclic aromatic hydrocarbons (PAHs) by EPA Method 8270, and diesel-range organics by EPA Method 8015. All field and laboratory methods will be conducted in general accordance with the EPA-approved Site Investigation Work Plan.

For the purpose of this ditch remediation only, soil sample results will be compared to the Region IX PRGs and MTCA screening levels. If one or more of the soil samples exceed these criteria, additional soil will be excavated from the ditch, and soil samples will be collected and analyzed as described above.

Disposal

A single sample of the excavated material will be collected for laboratory analysis and profiling. Following final acceptance of the waste profile and preparation of shipping manifests, the ditch material will be loaded into trucks for shipment to Waste Management's Subtitle C disposal facility in Arlington, Oregon for appropriate treatment and/or disposal.

We would appreciate your written approval of these activities at your earliest convenience. If you have any questions, please do not hesitate to call me at (541) 689-3801.

Sincerely,

RueAnn Thomas

RueAnn Thomas
Environmental Programs Director

cc: Jeanne Tran, Department of Ecology
Georgia Baxter, J.H. Baxter & Co.
Mary Larson, J.H. Baxter & Co.
J. Stephen Barnett, Premier Environmental Services

enclosure

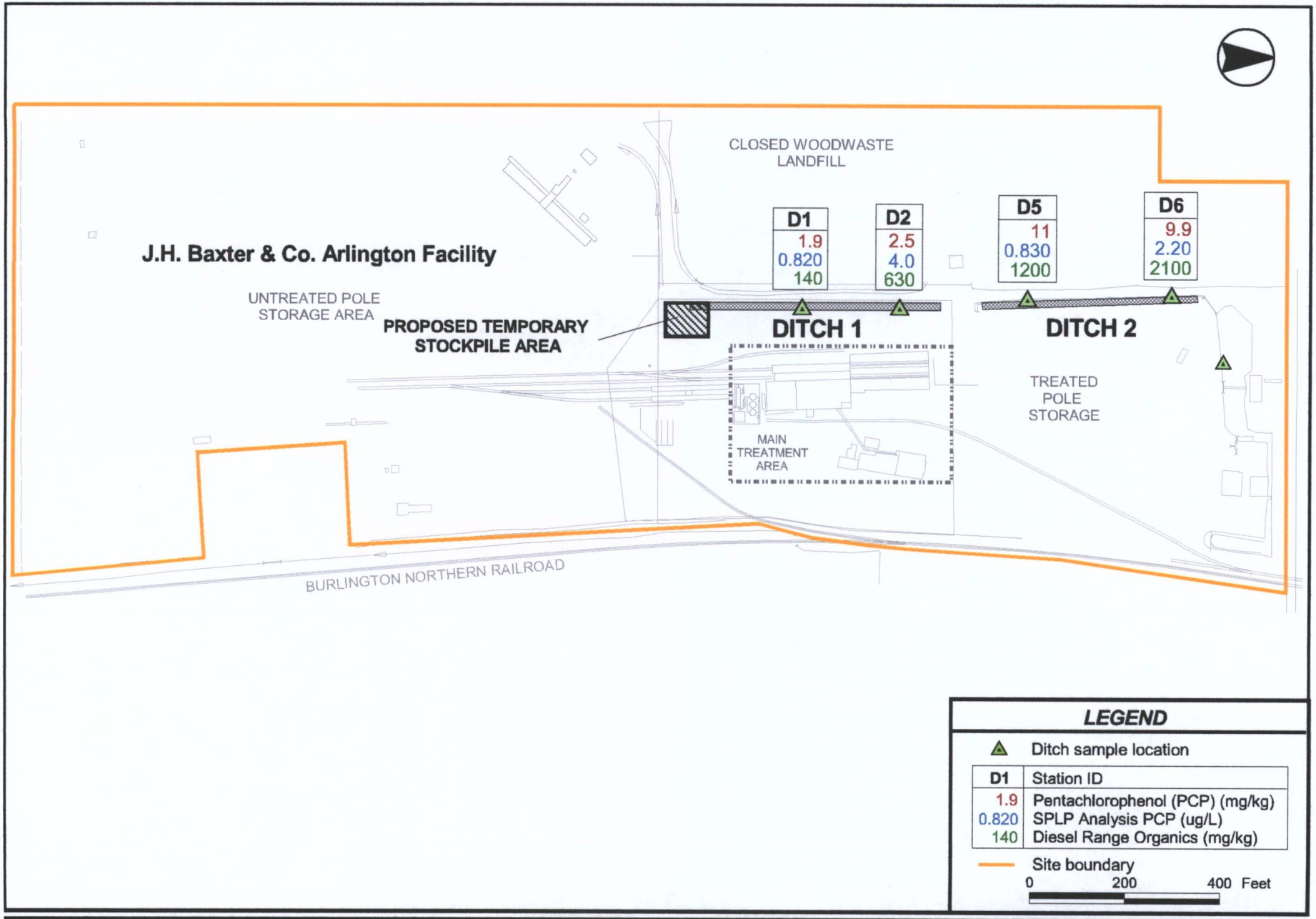

Figure 1. Ditch Material Excavation Area and Sediment Concentrations - Arlington, WA